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July 26, 2023

*Via ECF Filing*  
Hon. Elizabeth S. Stong  
U.S. Bankruptcy Court  
271-C Cadman Plaza East  
Brooklyn, NY 11201

**Re: 14 East 52<sup>nd</sup> Street, New York, New York**  
**Case No. 23-41364 (ESS)**

Dear Judge Stong:

As counsel for the Chapter 11 debtor herein, 14 East 52<sup>nd</sup> Street Devco LLC (the “Debtor”), I write to bring the Court up to date with the status of the case in advance of the hearing scheduled for tomorrow.

The Debtor served the ballot and solicitation package on the sole creditor, Inmoprisa USA LLC (the “Seller”) which voted to accept the plan of reorganization providing for the Debtor’s purchase of the development property at 14 East 52<sup>nd</sup> Street, New York, NY (the “Property”). A certification of the balloting has been filed on the ECF docket earlier today.

However, the Debtor intends to use the Court hearing tomorrow to update the Court as to its progress in completing financing and to request an adjournment of the confirmation hearing to a date prior to August 7. The Debtor is still in discussions with its lenders, but it is clear that in order to close the Debtor will need an extension beyond August 7 for a period of approximately two weeks.

We are hopeful that the Seller will voluntarily agree to an extension, but to date consent has not yet been obtained.

Very truly yours,

/s/ Kevin J. Nash

cc: Nazar Khodorovsky, Esq.  
Lucy Kweskin, Esq.